

POMERANTZ LLP

J. Alexander Hood II
Partner

December 17, 2024

VIA ECF

Hon. Katherine Polk Failla, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

RE: *Collura v. Warner Bros. Discovery, Inc. et al.*, 1:24-cv-09027-KPF

Dear Judge Failla:

Pomerantz LLP represents Plaintiff Richard Collura (“Plaintiff”) in the above-referenced putative class action (the “Action”). We write to seek clarification of this Court’s Order dated December 16, 2024 (the “Scheduling Order”) (Dkt. No. 9), specifically regarding the deadlines set forth therein for any motions for appointment as Lead Plaintiff in this Action and any opposition to the same.

As the Court’s Scheduling Order acknowledges, on November 25, 2024, Plaintiff’s counsel caused to be published the statutorily required notice (the “Notice”) of this Action pursuant to the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), 15 U.S.C. § 78u-4(a)(3)(A). *See* Dkt. No. 8. As the Court’s Scheduling Order likewise acknowledges, pursuant to the PSLRA, “not later than 60 days after the date on which the notice is published, any member of the purported class may move the court to serve as lead plaintiff of the purported class.” 15 U.S.C. § 78u-4(a)(3)(A)(i)(II). Accordingly, applying the statutory 60-day notice period to the publication date of the Notice, Plaintiff respectfully submits that the statutory motion deadline would be **January 24, 2025**. The Court’s Scheduling Order, however, sets a deadline of **February 24, 2025**.

Accordingly, Plaintiff most respectfully seeks clarification regarding the deadline for motions seeking appointment as Lead Plaintiff in this Action and for any opposition to the same.

Respectfully submitted,

/s/ J. Alexander Hood II
J. Alexander Hood II

cc: All counsel of record (via ECF)

ahood@pomlaw.com

600 Third Avenue, New York, NY 10016 Main: 212.661.1100 Direct: 646.581.9966

NEW YORK • CHICAGO • LOS ANGELES • PARIS • TEL AVIV

www.pomlaw.com